

# **LOUISIANA STATE CONFERENCE NAACP**

## **Exhibit A**

### **T.B. Declaration**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION**

Case No. 69-cv-14430

UNITED STATES OF AMERICA,

Plaintiff,

v.

CATAHOULA PARISH SCHOOL BOARD,  
ET AL,

Defendants.

**DECLARATION OF T.B.**

I, T.B., do hereby state as follows:

1. I make this Declaration based on my own personal knowledge and am competent to testify concerning the matters set forth below.
2. I am 17 years old and currently a student at Block High School in the 11th grade.
3. I have attended schools in the Catahoula Parish school district for all my years of schooling and previously attended Jonesville Junior High and Jonesville Elementary. I briefly attended Harrisonburg High School when I was in 7th grade.
4. The conditions in the building where we take classes, Building C, are poor. There is a horrible smell as soon as you walk in as if something died in the building. There have been a few times where other students and I have walked into our Algebra class and it smelled so bad that we had to step outside. We asked the teacher if he could spray air freshener but he

responded that even if it sprayed, it would not do any good. There are also cracked doors, stained carpets, and broken air conditioners in the hallways. The air conditioners in the classroom leak water onto the carpets, causing odors. There is only one restroom that female students in grades 8 through 12 are permitted to use, and that bathroom only has three stalls. These stalls have large cracks on the doors, making it easy for anyone to see inside. There is also rarely any soap or toilet paper in the bathrooms. Other students and I raised these concerns with the assistant principal but he said he could not do anything about it. While there are lockers in the building, students have to pay around \$10 just to use a locker so none of the students use them. We also are unable to use the concession stand by our athletic fields since it has broken glass.

5. We cannot take classes in Building B because it is unsafe and there is mold in the building. The teachers warned us that if we went on the second floor, the floor might fall in. We are only permitted to use the auditorium in that building. Our only science lab is in Building B and so we are unable to use the lab in our science classes. Instead we either fill out packets photocopied from one textbook since there are not enough textbooks for everyone, or we do work online through Edgenuity.com.

6. Building A looks the best out of all the buildings at Block, but students are only allowed to use the cafeteria in that building. There is a nicer, cleaner women's restroom in Building A, but female students are not permitted inside. Some students try to sneak over to Building A when it is their time of the month to use the restroom since the bathroom in Building C lacks privacy, but they are told to go back. We are told we must use the bathroom in Building C with the broken stalls. Students are not even permitted to walk through the main hallway in Building A to get to the cafeteria and instead must walk all the way around the building outside,

even if it is cold or raining.

7. Since we are only able to have classes in Building C, there is overcrowding. All of the students in grades 8 through 12 take classes in one hallway which is so cramped that when the bell rings there is pushing and shoving and sometimes students are late to their classes. We are all also expected to eat lunch at the same time and have less than 30 minutes to walk from Building C around Building A to the cafeteria, wait in what is often a very long line, and eat our lunch.

8. Recently the school has done some repairs, but it seems like all they did was try to throw things together and patch things up. Between November and December of 2018 our former principal had painters come in and paint the walls in the halls and bathrooms, but they left paint all over the floors and did not address the smells or other poor conditions in Building C.

9. I enrolled at Harrisonburg when I was in 7th grade. My experience was completely different when I went to Harrisonburg High School. The buildings there were a lot cleaner. There was no paint on the floors, the textbooks were newer and did not have mold on them, and the classrooms did not smell. My teacher actually stood in front of the class and taught us rather than having us simply go on the computer. I was one of three Black students in my class. Less than two weeks after I arrived, the principal called my mom and said that I had a Jonesville address so I could not attend Harrisonburg.

10. Our former principal resigned about two weeks ago in order to take a position at Harrisonburg High.

11. Recently, a lot of students have been transferring from Block High to Harrisonburg and other schools outside of the district. Almost all of these students have been

white.

12. Block High is not preparing me for life after graduation. I am just going to school to do work online, but I can stay at home and do work online.

13. Many of my teachers are substitutes or just sit at their desks while I do work online. For instance, my Spanish class is taught by a substitute but all she does is tell us to sit down and use an online program, and she is unable to answer our questions. There is also a substitute teaching my Customer Service class so all we do is go online to the ACT Career Ready website. In History, the school hired a teacher this week to teach the class, but we do not have enough textbooks. Students have to share textbooks because many of the books have mold in them. Some students instead choose to use a moldy textbook because they want to work independently. Prior to this teacher arriving, we did not use the textbooks at all and just did online learning since an athletic coach was teaching the class.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 3/11/19

Signed: \_\_\_\_\_

  
T.B.

**PARENTAL CONSENT AND DECLARATION**

I, Cynthia Barber, do hereby state that I am the natural parent and/or legal guardian of T.B. and declare as follows:

1. I am entitled to the full control and custody of T.B. and am responsible for her care, custody and control.
2. I acknowledge that T.B. voluntarily elects to execute this declaration, and I consent to her execution of same.
3. I also declare that I am aware of and/or have witnessed the circumstances described by T.B. in this declaration.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 3/11/19

Signed:

  
Cynthia Barber